

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

DOLLY E. FEREBEE, for herself and
others similarly situated,

Plaintiffs,

v.

NYCOLE MACKLIN, *et al.*,

Defendants.

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Civil Action No. 2:22-cv-01155-KBH

**DEFENDANT THE PHILADELPHIA PARKING AUTHORITY’S MEMORANDUM OF
LAW IN OPPOSITION TO PLAINTIFF’S MOTION FOR RECONSIDERATION**

Defendant, the Philadelphia Parking Authority (“PPA”) hereby incorporates by reference and adopts the arguments and reasoning set forth in the City of Philadelphia’s “Response in Opposition to Plaintiff’s Motion and Memorandum of Law to Reconsider Order Dismissing Count II of the Second Amended Complaint for Declaratory Relief.” Dkt. No. 41.

Plaintiff fails to satisfy the unquestionably high standard required to obtain reconsideration of the Court’s Order Dismissing Count II of her Second Amended Complaint and presents no new arguments that would warrant a different result. The Court correctly dismissed Count II of Plaintiff’s Second Amended Complaint and should likewise deny Plaintiff’s attempts to salvage her claim for declaratory relief by way of reconsideration.

CONCLUSION

For these reasons, and those set forth in the City's Response and PPA's briefing on the Motion to Dismiss Plaintiff's Second Amended Complaint, PPA respectfully requests that the Court deny Plaintiff's Motion for Reconsideration in its entirety.

Respectfully submitted,

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